

EX PARTE OR LATE FILED

RECEIVED

JUN 6 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

June 6, 1996

Ms. Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: Ex Parte, Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Keeney,

A Service Management System (SMS) to administer ported numbers and their associated Location Routing Numbers (LRNs) is essential to the implementation of any permanent number portability solution. Absent national direction from the Commission, the industry has been proceeding at the state level to both select LRN as the call model and define requirements for the SMS. The path that the industry in Illinois has taken to implement an SMS, with oversight from the Illinois Commerce Commission, includes:

- The formation of an SMS industry subcommittee of the number portability task force
- The definition of SMS requirements including the definition of the neutral third party administrator
- The development and issuance of a Request for Proposal (RFP)
- The review of bids and the selection of a vendor
- The formation of a Limited Liability Corporation (LLC) for the purpose of establishing a legal entity to enter into contract with the vendor

In other states, such as Georgia, Maryland, and Colorado, the industry is pursuing similar paths. To extend the successes in these states to the rest of the country, an effort at the national level to design and build an efficient and consistent SMS architecture is required.

A national SMS architecture, regionally deployed and built off the states' efforts, is an integral component of the permanent number portability solution. The Commission should take a strong role for two reasons:

No. of Copies rec'd
List ABCDE

022

1. To ensure that the states continue their efforts toward an early initial LRN deployment.
2. To provide oversight to and participate with an industry-led effort at the national level to develop an SMS implementation plan as an integral part of the overall local number portability nationwide deployment schedule.

The deployment of such a consistent, national SMS infrastructure, together with the significant, ongoing role of the states in the deployment of number portability within local exchange carriers' networks, will enhance the overall efficiency and operation of the permanent number portability solution especially for regional and national carriers.

The best way to proceed is to continue the progress in the states and use what has been learned in the states to develop a national SMS infrastructure. The state and national efforts should proceed in parallel until the national infrastructure is ready to integrate with the states' SMS efforts. The industry development and deployment of a consistent national SMS infrastructure could be accomplished by the following plan. Most of the steps in the plan are similar to the processes used in Illinois, Georgia, Maryland, and Colorado to implement state SMSs.

1. Convene an Industry Group to Form a National Entity to Design and Manage a National SMS Infrastructure

The Commission should initiate the national effort by hosting an initial meeting and inviting industry representatives to attend for the purpose of forming a national legal entity to lead the design and management of a national SMS infrastructure. The representatives retain neutral, legal counsel to begin drafting the legal agreement that would define the membership, voting rights, operating structure, and guidelines for the new national entity. The industry group utilizes the substantial progress in this area in the states as a starting point for the development of its legal agreement. The national legal entity is established.

2. Develop and Issue the National RFP

The national entity defines the requirements for the national SMS infrastructure including the geographical regions that each regional SMS would cover and the criteria that a vendor must meet to ensure that the administration function is performed by a neutral third party. The national entity draws upon the experience in the states by using the state number portability task forces' SMS RFPs as a starting point. The entity establishes criteria by which it will fairly and impartially evaluate the responses to the RFP. It finalizes and issues a national RFP. The advantage is in the consistency and uniformity of the interface specifications and operations centers procedures.

3. Evaluate and Select Vendors

Based on the criteria it developed, the national entity selects the vendor(s) for each region.

4. Enter into Contracts with the Vendors

The national entity, through the use of legal counsel, prepares contracts between the vendor(s) and the users of each regional SMS. Care must be taken to ensure that the terms and conditions of the contracts are uniform for all users to ensure no discrimination.

5. Establish and Provide Ongoing Management Oversight

The national entity initially works with the vendors to develop the detailed requirements for the regional SMSs and manage the initial design, development, installation, and testing. The entity develops and establishes its guidelines for the ongoing management of the contracts with the vendors, including contract renewals and the use of new vendors.

6. Integrate State LLCs with the National Entity

The national entity, in cooperation with the state LLCs, determines the best process and timing for transitioning the integration of the national SMS architecture with existing SMSs. This may be accomplished by first reassigning existing contracts to the national entity and then dissolving the state LLCs, as needed. The national entity would then manage the transition to the national architecture. In this way there is no reason to slow down the deployment of state SMSs needed for the successful early implementation of number portability.

Crucial to this approach is the cooperation of the members of the industry to come together for the purpose of forming a consistent national entity to most efficiently manage and direct the design, building, and operation of the SMSs from the national perspective. The Commission should establish a specific schedule to form the national entity and to develop, implement, and integrate the regional SMSs in order to prevent a delay in the implementation of permanent number portability. Based on the timeline for the implementation of the SMS in Illinois, the undersigned parties believe that the following schedule is reasonable and should be adopted by the Commission.

<i>Proposed National SMS Infrastructure Implementation Schedule</i>	
Date	Major Milestone Description
6/27/96	Commission Order Establishing National Entity and Timeline
8/1/96	Industry Group Convenes
12/20/96	National Entity Completes Evaluation and Selects Vendors to Design and Build the Regional SMSs
8/1/97	Vendors Complete System Design and Begin Testing
10/1/97	Vendors and Users Complete SMS Testing, System Operational

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.

Sincerely,



Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

R. G. Salemm
Vice President - Federal Government Affairs
AT&T Corporation

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

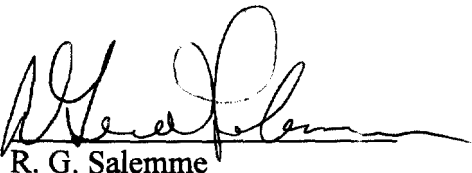
Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.



R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.


Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

R. G. Salemm
Vice President - Federal Government Affairs
AT&T Corporation

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications



Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

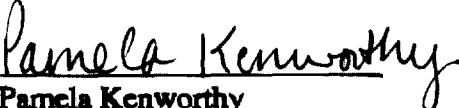
Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.


Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.

Sincerely,



Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.

Sincerely,

Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

R. G. Salemme
Vice President - Federal Government Affairs
AT&T Corporation



Jamie Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.

The Commission stated in its NPRM in CC Docket 96-98, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, in paragraph 199, in referring to its proceeding in CC Docket 95-116, "That proceeding will specifically address, *inter alia*, the deployment schedule that incumbent LECs must follow for providing number portability, the manner in which it can be provided, and the recovery of number portability costs." The undersigned parties urge the Commission to incorporate the above deployment plan and schedule to implement a national SMS infrastructure as a component of the Commission's direction to the industry to provide nationwide number portability.

Sincerely,


Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech

Edmund P. Gould
Vice President - Technology
Teleport Communications Group, Inc.

R. G. Salernme
Vice President - Federal Government Affairs
AT&T Corporation

Janis Stahlhut
Vice President - Regulatory Operations
Time Warner Communications

Donald F. Evans
Vice President - Federal Regulatory Affairs
MCI Telecommunications Corporation

 *Kenneth M. Pichonich, CPA for*
Ron Havens
Director - Industry Forums
Sprint Communications Company, L.P.

Pamela Kenworthy
Senior Manager - Number Resource Planning
MFS Communications Company, Inc.